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9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 OAKLAND DIVISION  
12

13 UNITED STATES OF AMERICA,	)	CASE NO. CR 19-0291 JD
	)	
14 Plaintiff,	)	STIPULATION TO CONTINUE HEARING AND
	)	EXCLUDE TIME UNDER THE SPEEDY TRIAL
15 v.	)	ACT FROM FEBRUARY 19, 2020, THROUGH
	)	APRIL 15, 2020 AND <del>PROPOSED</del> ORDER
16 PAULISHA TANNER,	)	
	)	
17 Defendant.	)	
	)	

18  
19 The above-entitled matter is currently set for trial setting before this Court on Wednesday,  
20 February 19, 2020. The parties are close to a resolution, but are not prepared to proceed with that  
21 resolution on February 19, 2020. Accordingly, the parties jointly stipulate and move this Court for a  
22 continuance of the hearing set before this Court from February 19, 2020, to April 15, 2020, at 10:30 a.m.

23 Counsel for both parties need additional time to investigate and finalize the resolution, and  
24 stipulate that time may be excluded from the speedy trial clock pursuant to 18 U.S.C. §  
25 3161(h)(7)(B)(iv).

26 Accordingly, the parties stipulate, and ask the Court to find, that the requested continuance and  
27 exclusion of time are in the interests of justice and outweigh the best interest of the public and the  
28 defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

1 IT IS SO STIPULATED

2 DATED: February 18, 2020

Respectfully submitted,

3 DAVID L. ANDERSON  
4 United States Attorney

5 /s/  
6 CHRISTIAAN HIGHSMITH  
7 Assistant United States Attorney

8 Dated: February 18, 2020

9 /s/  
10 GRAHAM ARCHER  
11 Assistant Federal Defender  
12 Attorney for Defendant Paulisha Tanner

13 **~~[PROPOSED]~~ ORDER**

14 Based upon the facts set forth in the stipulation of the parties and for good cause shown, the  
15 Court hereby continues the hearing in this matter scheduled for February 19, 2020, to April 15, 2020.  
16 Further, the Court finds that failing to exclude the time from February 19, 2020, through April 15, 2020,  
17 would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective  
18 preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The  
19 Court further finds that the ends of justice served by excluding the time from February 19, 2020, through  
20 April 15, 2020, from computation under the Speedy Trial Act outweigh the best interests of the public  
21 and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY  
22 ORDERED that the time from February 19, 2020, through April 15, 2020, shall be excluded from  
23 computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

24 IT IS SO ORDERED.

25 DATED: February 28, 2020

